

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Tailinh F. Agoyo : No. 18-17456-ELF
Herman Agoyo :
Debtors :

ANSWER TO MOTION OF TOYOTA MOTOR CREDIT CORPORATION
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted some payments were missed and not made on time.
7. Admitted some payments were missed and debtors ask for the chance to catch up.
8. Debtors dispute the total amount owed and will provide proof of all payments made from March 2019 through December 2019. Debtors request a review of accounting and ask for the chance to catch up the remaining arrears after their payments have been considered.
9. Denied. Debtors made some payments and ask for the chance to catch up the remaining arrears.
10. Denied.
11. No response required.

WHEREFORE Debtors respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 1/8/20

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf Toyota Motor Credit Corporation
bkgroup@kmlawgroup.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 1/8/20